

Benjamin D. Brown (State Bar No. 202545)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408 4699  
bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

**Cung Le, Nathan Quarry, and Jon Fitch, on  
behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Case No. 5:14-cv-05484-EJD; Case No. 5:14-cv-  
05591-EJD; Case No. 5:14-cv-05621-EJD**

**DECLARATION OF BENJAMIN D. BROWN  
IN SUPPORT OF MOTION TO APPOINT  
INTERIM CO-LEAD CLASS COUNSEL**

**Luis Javier Vazquez and Dennis Lloyd Hallman,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Brandon Vera and Pablo Garza, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

5:14-cv-05484-EJD  
5:14-cv-05591-EJD  
5:14-cv-05621-EJD

1 I, Benjamin D. Brown, declare:

2 1. I am a partner of the law firm Cohen Milstein Sellers & Toll PLLC, where I have worked  
3 in the Antitrust Practice Group since 2005. I have personal knowledge of the matters stated herein and, if  
4 called upon, I could and would testify competently thereto.

5 2. Attached as Exhibit A is a true and correct copy of Cohen Milstein's firm resume.

6 3. I am submitting this Declaration in support of the Motion to Appoint Interim Co-Lead  
7 Class Counsel.

8 4. Cohen Milstein is one of the largest and oldest firms in the country primarily focused on  
9 complex class action litigation. The quality of Cohen Milstein's work in antitrust litigation has been  
10 widely recognized. In January 2014, Cohen Milstein's Antitrust Practice Group was selected by Law360  
11 as a Competition Practice Group of the year and was the only firm outside the AmLaw 200 so selected.  
12 Cohen Milstein was also selected, in both 2013 and 2014, as one of the "Most Feared Plaintiffs Firms,"  
13 based on its successes in complex class action litigation.

14 5. Cohen Milstein's resources and breadth of litigation capabilities would be important given  
15 the sophistication and resources of the Defendants and defense counsel in this case. The firm has 80  
16 lawyers practicing in five offices, including 23 attorneys who devote all or virtually all of their practices  
17 to antitrust matters.

18 6. Cohen Milstein has both the skill and resources to take complex antitrust cases to trial  
19 when appropriate. Our firm has taken numerous complex class action cases through trial in recent years,  
20 including multiple antitrust class actions. Most recently, Cohen Milstein served as one of the trial  
21 counsel in *In re Urethane Antitrust Litigation*. The Urethane trial team secured a jury verdict of \$1.1  
22 billion after trebling in a price-fixing case against Dow Chemical in 2013. That verdict was unanimously  
23 affirmed in a recent Tenth Circuit opinion. We were also co-lead counsel in the E-Books price-fixing  
24 litigation against Apple Corporation, which culminated in a settlement shortly before trial in 2014, after  
25 we successfully sought exclusion of one of Apple's experts and severely limited the testimony of its  
26 other expert. This settlement could result in payment by Apple of \$450 million and compensation to  
27 consumers of more than 200% of single damages, depending on the outcome of a related appeal.

28 I declare under penalty of perjury that the foregoing is true and correct. This declaration was

1 executed in Washington, DC on February 12, 2015.

2  
3 By: /s/ Benjamin D. Brown  
4 Benjamin D. Brown

5 Benjamin D. Brown (State Bar No. 202545)  
6 COHEN MILSTEIN SELLERS & TOLL, PLLC  
7 1100 New York Ave., N.W., Suite 500, East Tower  
8 Washington, DC 20005  
9 Telephone: (202) 408-4600  
10 Facsimile: (202) 408 4699  
11 bbrown@cohenmilstein.com  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28